

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

NOKIA CORP., NOKIA SOLUTIONS AND  
NETWORKS OY, and NOKIA OF  
AMERICA CORP.,

Defendants.

Civil Action No. 2:21-CV-00310-JRG  
(Lead Case)

Civil Action No. 2:21-CV-00309-JRG  
(Member Case)

NOKIA OF AMERICA CORP.,

Third-Party Plaintiff,

v.

BROADCOM CORP., BROADCOM INC.,  
and AVAGO TECHNOLOGIES  
INTERNATIONAL SALES PTE. LTD.,

Third-Party Defendants.

**DECLARATION OF MELISSA RICHARDS SMITH IN SUPPORT OF  
THIRD-PARTY DEFENDANTS' REPLY IN SUPPORT OF MOTION TO DISMISS**

I, Melissa Richards Smith, declare as follows:

1. I am a partner with Gillam & Smith, counsel for Third-Party Defendants Broadcom Corp., Broadcom Inc., and Avago Technologies International Sales Pte. Ltd. (collectively, "Broadcom"). I have personal knowledge of the facts set forth below. If called upon and sworn as a witness, I could and would competently testify as set forth below.

2. Attached hereto as Exhibit A is a true and correct copy of Dkt. No. 74-2 from *Cottman Avenue PRP Group v. AMEC Foster Wheeler Environmental Infrastructure Inc.*, Case No. 2:16-cv-06613, filed June 10, 2019.

3. Attached hereto as Exhibit B is a true and correct copy of the brief of Appellee/Cross-Appellant in *Lake Imaging, LLC v. Franciscan Alliance, Inc.*, Case No. 20A-CT-1490, filed November 2, 2020.

4. Attached hereto as Exhibit C is a true and correct copy of the [REDACTED]

I declare under penalty of perjury that the foregoing is true and correct. This declaration was executed this 5th day of May, 2022, in Marshall, Texas.

/s/Melissa R. Smith  
Melissa R. Smith